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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA,)
10 Plaintiff,) No. CR 07-0747 SI
11 v.) [PROPOSED] STIPULATED
12 CHRISTOPHER REYNOLDS,) ORDER CONTINUING
13 Defendant.) ARRAIGNMENT
14

15 The defendant Christopher Reynolds is charged in two federal districts with bank
16 robbery. Since Mr. Reynolds' initial appearance his counsel, AFDPD Steven Kalar, has been
17 working to resolve these two prosecutions matters in a global disposition. In this proposed
18 stipulated order, the parties represent that they are continuing to work on a global resolution
19 and hope to be entering a plea to charging documents for both cases at the next appearance
20 before the magistrate.

21 Mr. Reynolds is currently scheduled to appear before the Court on Tuesday, July 8,
22 2008 for arraignment. In this stipulated order, Mr. Kalar represents that he is unavailable on
23 that date due to a full-day evidentiary hearing scheduled before the Honorable Charles R.
24 Breyer. The defense accordingly requests that the arraignment be continued to July 31, 2008.
25 The parties will continue discussions with government counsel and appointed defense
26 counsel in the Western District of New York regarding a global disposition and hope to have

1 a disposition for both matters by July 31st.

2 The government has no objection to this request.

3 Therefore, for good cause shown the arraignment now scheduled for Mr. Reynolds on
4 July 8th shall be vacated. The matter shall be added to the Court's calendar on Thursday, July
5 31, 2008 at 9:30 for arraignment. Time for arraignment and under the Speedy Trial Act shall
6 be excluded under Federal Rule of Criminal Procedure 5.1 for good cause and to permit for
7 the continuity of counsel. Fed. R. Crim. Proc. 5.1; 18 U.S.C. Section 3161(h)(8)(A) &
8 (B)(iv).

9 IT IS SO ORDERED.

10
11 _____
12 DATED

MARIA ELENA-JAMES
United States Magistrate Judge

13
14 IT IS SO STIPULATED.

15
16 7/1/2008
17 DATED

/s
JOSEPH P. RUSSONIELLO
United States Attorney
Northern District of California
AL SAMBAT
Assistant United States Attorney

18
19
20
21
22 7/1/2008
23 DATED

/s
BARRY J. PORTMAN
Federal Public Defender
Northern District of California
STEVEN G. KALAR
Assistant Federal Public Defender